

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS  
ANTITRUST LITIGATION

Master File No. 12-md-02311

Hon. Sean F. Cox  
Mag. Judge R. Steven Whalen

THIS DOCUMENT RELATES TO:

ALL END-PAYOR ACTIONS

**FINANCIAL RECOVERY SERVICES, LLC'S  
EX PARTE MOTION FOR EXTENSION OF PAGES**

Financial Recovery Services, LLC ("FRS"), through its undersigned counsel, brings this *ex parte* motion pursuant to L.R. 7.1(d)(3) to request leave to file a reply brief of no more than 9 pages, excluding signatures, in support of its Motion to Compel Acceptance and Processing of Vehicle Data ("Motion").

In support of this motion, FRS states that this extension of the Local Rules' page limit is necessary for FRS to respond fully to the issues raised in the Response by counsel for End-Payor Plaintiffs ("Class Counsel") to FRS's Motion. Specifically, additional pages are necessary to: (i) address and refute misleading factual representations raised by Class Counsel; (ii) set forth an accurate factual history of the claims submission process, which has been mischaracterized by Class Counsel; and (iii) accurately summarize this Court's prior orders, and the

pertinent procedural and administrative posture of this action, to ensure that this Court has a full and fair picture of this case's landscape.

FRS believes that addressing these matters is necessary to facilitate a just decision on the Motion. As Class Counsel were permitted to file a Response to the Motion exceeding the page limits set forth in the Local Rules by this Court's order dated March 4, 2021 [ECF 2121, PageID.38524], FRS requests the same accommodation be extended to it in replying to that Response.

WHEREFORE, FRS respectfully requests that this Court grant it leave, on an *ex parte* basis, to file its Reply in Support of its Motion to Compel Acceptance and Processing of Vehicle Data of no more than 9 pages, excluding signatures.

Dated: March 9, 2021                   Respectfully submitted,

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*Counsel for Financial Recovery  
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**CERTIFICATE OF SERVICE**

I hereby certify that, on March 9, 2021, I electronically filed the foregoing document with the Clerk of the Court using the ECF system, which will send notification of such filing to counsel of record.

/s/ *Laura S. Faussié*  
Laura S. Faussié